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**To:** Claudia Hanson, Office of the City Manager, City of Reno (*with permission for distribution*)

**From:** Alicia Barber, PhD, Stories in Place LLC ([alicia@storiesinplace.com](mailto:alicia@storiesinplace.com))

**Re:** Proposed procedural requirements for naming and renaming public facilities

In reading the draft of “Procedural Requirements to Name or Rename City of Reno Facilities” including streets, parks, trails, buildings, and other facilities, I find a number of areas in which the draft as written lacks some critical safeguards to ensure community participation, fairness, and proper justification regarding the policies for renaming in particular. I will elaborate on these concerns and suggestions in the following pages, but in short, they include the following:

1. The policy regarding the renaming of streets should require a different process than that pertaining to buildings, parks, and other facilities. Specifically, any proposed street renaming should require approval by a majority of that street’s residents (at least 50%) and involve a different process of notification, since renaming streets impacts each affected resident personally, in a way that renaming other public facilities does not.
2. The applicant who is proposing that a public facility, street, etc. should be renamed should be required to provide justification for the proposed renaming along with the current requirements of providing a history of the current name and explanation of the proposed new name. As written, the burden of justifying the removal of a current name is placed solely on the naming/renaming committee rather than on the person or people suggesting the change.
3. There is a complete absence of any identified criteria that would warrant the renaming of a city parkland, trail, building, streets, or other public facility or an explanation of how those criteria would be applied. Without such criteria or required findings, the discussion of any renaming would not be based upon an accepted set of standards or specific series of questions to be considered and answered, leaving any name changes potentially open to charges of arbitrariness, political motivation, or favoritism.
4. The language of the policy has been changed from the original so that it no longer discourages renaming of public facilities and streets or indicates that names established through legal deeds cannot be changed. These changes are not appropriate, and the discouragement of renaming and the indication of the primacy of legal deeds should be reinstated.
5. The complete rewriting of this policy seems ill-conceived at a time when the City of Reno is suffering from a severe curtailing of public involvement and participation in governmental activities due to the regulations and restrictions required to ensure public safety during the COVID-19 pandemic. A policy like this would normally be the subject of open public workshops to ensure the broadest possible public awareness and participation in the formulation of a policy with the potential to impact every single resident of the City of Reno. There has been practically no notification regarding the ongoing revision of this policy, and the vast majority of residents are likely completely unaware that it is even under consideration. The process of revising this policy should be delayed until widespread public awareness and active participation in the policymaking process can be guaranteed.

## 1. The need for a separate process regarding the renaming of city streets vs. other facilities

When it comes to the potential renaming of a city street, the opinions of affected property owners deserve formal consideration and prioritization for a number of reasons. It would be difficult to think of a city policy that would literally hit home for more residents than the policy governing the naming and renaming of the streets where they live. The absence of special consideration for the residents of the street(s) in question would leave affected property owners without a significant voice in decisions immediately impacting their homes, property, and potentially their livelihood.

It is critical that a street name change be supported by a majority of the property owners along that street in order to demonstrate that this change is desired by at least a simple majority of those most directly affected. This is vital not only to reflect buy-in from the community, but to acknowledge that changing one's address impacts multiple aspects of property ownership, in addition to the often longstanding and deeply-held ties of tradition, continuity, and history.

More directly and pragmatically, a permanent change to the name of one's street requires changes to legal paperwork including bank accounts, wills, trusts, deeds, and utilities, and countless other paperwork and agreements. In the case of commercial property owners, it can also necessitate changes to branding, licensing, advertisements, logistics, collateral, and more.

The requirement that a proposed name change be supported by a majority of that street's affected property owners is standard for most city policies of this nature. A quick Internet search produced the following policies, with the percentage of affected property owners required to rename a city street:

- In Mobile, Alabama, changing a street's name requires the approval of 90% of the property owners abutting the street:  
<https://www.cityofmobile.org/uploads/200625031009Policytorenamestreets.pdf>
- In San Jose, California, the required approval for a street name change is 50% of property owners: <https://www.sanjoseca.gov/home/showdocument?id=12817>
- In Harrisonburg, Virginia, the requirements is for 51% of affected property owners to approve such a change: <https://www.whsv.com/2020/07/15/harrisonburg-city-council-hears-new-naming-and-renaming-policy-for-city-spaces-and-facilities/>
- In St. Louis, Missouri, renaming a city street requires a petition to be signed by at least 51% of property owners: [https://www.stlouis-mo.gov/government/departments/planning/documents/upload/StreetRenaming2018\\_Revision.pdf](https://www.stlouis-mo.gov/government/departments/planning/documents/upload/StreetRenaming2018_Revision.pdf)
- In Phoenix, Arizona, changing a recorded street name requires support from 75% of affected property owners. For a street impacting 12 or fewer properties, the approval must be 100%: [https://www.phoenix.gov/pddsites/Documents/TRT/dsd\\_trt\\_pdf\\_00023.pdf](https://www.phoenix.gov/pddsites/Documents/TRT/dsd_trt_pdf_00023.pdf)

Not only are the residents of affected streets not given prioritized formal input in the policy draft currently under consideration by the City of Reno, but the notification process for any name changes as written doesn't make sense when it comes to streets.

The language in Section “D.g.” currently requires the City of Reno to send a postcard to “all property owners within 750 feet of the subject site.” While that measurement may make sense for a park, building, or other facility, it does not make sense for a street or thoroughfare, where its interpretation would be unclear. Would this require notifying residents of neighboring streets within 750 feet on either side of the affected street? What about the entire length of the street itself?

The required notice for the renaming of a street needs to be separated out from that regarding the renaming of a park, facility, or building, and the wording regarding streets should indicate that every resident who owns property abutting the affected street would be notified directly, in addition to requiring that a simple majority of them approve the change, as indicated above.

## 2. The need for the applicant to provide language justifying the removal of an existing name

In the current draft of this policy, section “C.d” the applicant is required to provide the history of how the existing name was established and explain the reasoning behind a proposed new name, but not to provide a justification for why the existing name should be removed. The implication seems to be that the reasons for renaming would be self-evident, when that is not necessarily the case. The justification to remove the original name is an important step that must also be a part of the original application.

The onus to justify a name change currently lies entirely on the naming/renaming committee. Sections “D.e.” and “D.f” indicate that the committee should solicit comments from the general public and those with knowledge of or expertise in local or state history, geography, or culture in order to formulate their recommendations to City Council, specifying that the committee is tasked with providing justification, explanation, and historical facts to recommend approval or denial of a name change.

While it is appropriate for this committee to consult with the community and relevant experts in formulating their recommendations, it should also be incumbent upon the applicant to provide a clearly stated justification for the removal of the original name, in order to provide the committee with better direction in how to evaluate those assertions and to ensure that the applicant has supplied ample argumentation to warrant the initiation of this process.

## 3. The need for clearly-stated and agreed-upon criteria that might warrant the removal of a name

The policy draft for renaming includes no language to indicate what might warrant the renaming of a street, park, trail, building, or other public facility. This is a major problem because the establishment of a process including various committees and avenues for input, leading to a City Council vote, but with no mention of required findings to guide such critical and impactful deliberations could threaten to leave the process open to charges of arbitrary or politically-motivated decision-making.

The requirement of consultation with historians and community members as referenced above is essential, and yet provides no direction for what questions that consultation would be attempting to address. Vague references to “consultation” can be open to significant interpretation if not accompanied by explicit direction to ensure that the consultation is both substantive and relevant. Both the committee, when formulating its recommendations, and the City Council, when considering a vote, need to be governed by standards to which everyone can refer, standard guidelines on which to base

their decisions. In other jurisdictions, the equivalent of a City Historian or Historical Resources Commission is tasked with the coordination of the required historical and place-based research to assist in this effort.

Other entities that have formulated policies for renaming buildings and other facilities have been explicit in delineating the factors that should be considered when taking on such a momentous decision. Stanford University, for instance, provides an excellent statement of principles regarding such matters: <https://campusnames.stanford.edu/renaming-principles/>. In terms of the names gracing city streets, parks, trails, buildings, and other public facilities, relevant factors should include the demonstrated harm and hardships caused by retaining the name and the potential harms and hardships of renaming.

If associated with a pattern or incident of offensive or morally repugnant behavior or beliefs by the named individual, relevant factors could include (as inspired by Stanford's policies):

- The centrality of the person's offensive behavior to his or her life and/or public persona as a whole.
- The relation of the name to the history of the city and/or neighborhood.
- Community identification with and attachment to the name.
- Perceived contemporary association of the name with the individual with whom it originates.
- Strength and clarity of historical evidence regarding the name.
- The city's original and any subsequent consideration of the name and relevant issues.
- Possibilities for mitigation (through interpretation, programming, signage or other means) of any harm should the name be maintained.

#### 4. Discouragement of renaming and reinstatement of language regarding primacy of deeds

The current policy draft has changed some of the original language that discouraged renaming in favor of stating in "H.a." that "the renaming of any facility should be considered with much deliberation." Such dilution of language is not appropriate for this policy. Indeed, renaming of any public facility including streets should rightfully be discouraged for the logistical, financial, and potentially political reasons discussed above, and only initiated under rare circumstances—another reason to explicitly lay out what factors might warrant such measures.

The discouragement of renaming of public streets and facilities is a common component of most relevant city policies, in order to hold such actions to the highest standards of justification and community benefit. Such language does not prevent any applicant from proposing a name change, but draws attention to the seriousness and widespread implications of such changes, which are not to be taken lightly.

The naming policy followed by the city of Mt. Pleasant, Michigan contains very effective language explaining why this is the case:

"The intent of naming is for permanent recognition. The renaming of parks and facilities is strongly discouraged. It is recommended that efforts to change a name be subject to the most crucial examination so as not to diminish the original justification for the name or discount the

value of the prior contributors. Parks named for subjects, other than individuals, may be changed in name only if the current name is ineffectual or inappropriate.”  
<http://www.mt-pleasant.org/docs/board/policies/Park%20Naming%20Policy-Procedure.pdf>

The current policy draft also dilutes the language regarding the primacy of legal deeds, stating in “H.a.” that “Any facility named through deed restriction shall be reviewed on [a] case by case basis as all deeds are uniquely worded.” While it is clearly important for all deeds to be reviewed on a case-by-case basis, it is also critical, for the sake of precedent and legal standing, to clearly state that public facilities explicitly named through a legal deed shall not be renamed.

Suggesting that such language is not legally binding could indicate to future donors of property that any names agreed upon by the City in a mutually accepted deed could be subject to future re-evaluation. The application of a mutually agreed-upon name to a public facility may in fact have been the sole reason for the donation of such property in the first place. Perhaps some rewording of this section could clarify what aspects of deed language would be considered legally binding and which would not.

As Stanford University’s renaming policy indicates, “Today’s decisions about naming and renaming may become controversial in the future. Thus, today’s decision makers should give the same respect to previous decision makers that they would like their decisions to be accorded in the future....The proper investigation of requests for renaming, and the possible responses (including physical alterations and mitigation efforts) require considerable time and effort, and should not be undertaken lightly.”

##### 5. Timing of this renaming policy discussion

The current effort to substantially revise the City of Reno’s naming and renaming policy for public facilities is occurring in the midst of a global pandemic unprecedented in living memory. There is no provision for live comment at government meetings, no opportunity for citizens to meet or stand face-to-face with their elected representatives, no Neighborhood Advisory Board meetings, and a myriad of issues making the lives of citizens incredibly stressful and difficult. Many members of our community, including seniors and those without stable technological resources are particularly impacted by the disruption to regular forms of civic participation and communication.

And yet despite these circumstances, the process to revise this policy appears to be proceeding very quickly. A draft of this policy was reviewed by three city commissions in August of 2020 without substantial public notification or any live public comment, and a revised draft of that policy is currently being undertaken by those commissions separately, again with no live public comment, with their suggestions to be incorporated by city staff, and then forwarded to Reno City Council for a vote.

The timing and speed of this process is highly problematic. This is not the time to go about finalizing a policy with the potential to affect every single city resident, without substantial public notification and input. There is no reason to expedite this issue under these restrictive conditions.

The last thing the City of Reno should want is for residents who find themselves and their homes impacted by this policy to learn, only after it has been approved, that they could have played a role in its formulation. With that in mind, I urge you to either pause this process, or initiate a public awareness campaign to ensure that all Reno citizens have the ability to contribute their thoughts, as I have here.

# DRAFT

## PROCEDURAL REQUIREMENTS TO NAME OR RENAME

### CITY OF RENO FACILITIES

#### A. Purpose

- a. To establish a formal process and procedure for naming City facilities including but not limited to parklands, trails, buildings, streets, and other facilities. Monuments and art work are not addressed in this policy.

#### B. Objectives

- a. Provide name identification for individual facilities.
- b. Provide for citizen input in the process of naming/renaming facilities.
- c. Provide adequate process for the naming of facilities by the City Council with appropriate recommendations and input.

#### C. Applications - Filing of application required.

- a. All requests to name or rename a City of Reno facility, including, but not limited to all streets, parks, buildings, and trails requires an application to be submitted to the Office of the City Manager. The application form shall be made available at [www.reno.gov](http://www.reno.gov)
- b. All applications shall include a contact person(s) that will be available to represent the proposal.
- c. The application fee shall be established through the City of Reno fee resolution.
- d. At a minimum, applications shall contain:
  - i. For renaming - the existing name of the facility and the history of how the name was established.
  - ii. The proposed name and a detailed explanation of the reasoning behind the proposed name.
  - iii. Financial analysis of what the name change will cost and the funding source. Applicants should coordinate with City staff on this portion to determine what costs would be associated with the proposal. Cost should not be a determining factor in a proposal, but it could impact the implementation of any approved application.
- e. Any person, group, or agency may propose a change in or the addition of any name of a City of Reno facility through submittal of the application process and the associated fee.

#### D. Review

- a. A committee shall meet when applications are received. The committee shall be comprised of one member from each of the following:
  - i. Human Rights Commission
  - ii. Historical Resources Commission
  - iii. Recreation & Parks Commission
  - iv. Arts & Culture Commission

- v. Public Works Department staff
  - vi. Parks & Recreation Department staff
  - vii. Office of the City Manager staff
- b. Staff members will serve as advisors providing recommendations and comments while representing their respective departments and The City of Reno on a whole.
  - c. Each commission shall annually appoint a representative and one alternate for this purpose. An applicant shall not be a member of the committee. Should the applicant be the appointed committee member, the alternate shall serve in place.
  - d. It will be the responsibility of this committee to evaluate all proposals for changes in or additions to names of City facilities to assist in determining the most appropriate and acceptable names for use on signs, maps, and official documents.
  - e. The committee shall provide recommendations to City Council. Justification, explanation, and historical facts should accompany any recommendation which is forwarded to the City Council.
  - f. The committee shall, through outreach by City of Reno staff, solicit comments from the general public and those with knowledge of or expertise in local or state history, geography, or culture.
  - g. Renaming – When a request includes the renaming of a facility, notice shall be provided. This notice at a minimum shall include (1) postcards sent to all property owners within 750 feet of the subject site; (2) notice provided at [www.reno.gov](http://www.reno.gov); and (3) posting of the notice on the subject site. All noticing shall take place a minimum of ten days prior to the second public meeting identified below.
  - h. The naming of new streets shall be decided through the Washoe County Street Naming Committee. The renaming of streets within the City of Reno shall follow the naming process outlined within this policy.

#### E. Public Involvement

- a. The committee shall hold the first of three public meetings within 45 days of receipt of an application. This initial public meeting will be the presentation of the proposal, preliminary consideration of the proposal, and request for comments.
- b. A second public meeting shall be held between 30 and 60 days following the initial meeting. This timeline may be extended by the City Manager or his/her designee. The purpose of this meeting shall be to receive public comment related to the proposal.
- c. A third public meeting shall be held between 30 and 90 days following the second meeting. The purpose of the third public meeting is for the committee to discuss the proposal and public comments; and determine a final recommendation to City Council.
- d. If a park or trail is the subject of a proposal, the Recreation and Parks Commission shall review the proposal and provide comments at one of their regular meetings a minimum of ten days prior to the third public meeting described in item “c” above.
- e. Naming - When a proposal includes the original naming of a facility, the second public meeting is not required and the final committee meeting shall be held between 30 and 45 days following the initial meeting. If a park or trail is the subject of the naming proposal, the Recreation and Parks Commission shall review the proposal and provide comments at one of their regular meetings a minimum of ten days prior to the final committee meeting.

#### F. City Council Decision

- a. The recommendation of the committee shall be forwarded to the City Council within 30 days of the third public meeting.
  - b. City Council may request additional information prior to any decision.
  - c. City Council will make the final decision on the naming of any City facility.
  - d. Whenever the City Council takes final action on a proposal, the City of Reno shall notify the person, group, or agency who submitted the proposal and anyone who submitted comments during the process, which were accompanied by a valid email address. The final decision shall also be published at [www.reno.gov](http://www.reno.gov)
- G. Qualifying Names – It is the intent of these procedures to recommend names for the identification of City facilities to the City Council. These names should provide some form of individual identity related to:
- a. The geographic location of the facility;
  - b. An outstanding feature of the facility;
  - c. The adjoining subdivision or major street;
  - d. Commonly recognized historical event, group, or individual;
  - e. A concept which respects the past and present which has compelling community support;
  - f. An individual or group who contributed significantly to the acquisition or development of the individual facility or provided a service in the interest of City facilities or services. It is strongly recommended that the name of any individual be considered posthumously. However, discretion may be given to consider a name of a living person under compelling circumstances.
  - g. For an individual (excluding historically significant individuals) to be considered, that person must have contributed significantly to the acquisition or development of the park or facility or to the park system overall. A person providing volunteer work at a particular park would not typically be considered for naming unless the volunteer work was significant to the overall park system or the City as a whole.
  - h. The naming or renaming of a facility from or to the name of an individual must be accompanied by a biographical sketch which shall provide evidence of the contributions to the facility or overall city facilities and services.
  - i. Longevity in government service does not guarantee the naming of a facility after an individual.
- H. Facility Renaming
- a. The renaming of any facility should be considered with much deliberation. Any facility named through deed restriction shall be reviewed on case by case basis as all deeds are uniquely worded.
  - b. In order for a facility to be considered for renaming the following must occur:
    - i. The proposed name must qualify under this policy.
    - ii. The person, group, or agency proposing the name change shall enter into a written agreement with the City of Reno which outlines the responsibility of all costs associated with renaming including signage, brochures, publications, and administrative fees. City of Reno contribution to the associated costs may be approved by City Council but are not guaranteed. Timing of the changes may be delayed due to availability of funding.
  - c. Consideration of a proposed renaming will be subject to the review process stated above.



I. Other Naming Alternatives

- a. Facilities that are donated to the City of Reno can be named by deed restriction by the donor. The naming and acceptance of land is subject to approval by the City Council per NRS.